

STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**

Matt Blunt, Governor • Doyle Childers, Director

[www.dnr.mo.gov](http://www.dnr.mo.gov)

March 14, 2005

Ms. Stephanie Doolan  
United States Environmental Protection  
Agency, Region VII  
901 North 5<sup>th</sup> Street  
Kansas City, KS 66101

RE: Clean-up Completion Report (CCR) for Solid Waste Management Units (SWMUs)  
8, 11, 25, and 26 AK Steel Corporation, Kansas City, Missouri  
EPA ID# MOD007118029

Dear Ms. Doolan:

The Missouri Department of Natural Resources' Hazardous Waste Program (HWP) completed review of the November 25, 2003, CCR for SWMUs 8, 11, 25, and 26. On March 16, 2004, I discussed the HWP's comments regarding this report with you; however, formal comments were not submitted to the United States Environmental Protection Agency, Region VII (USEPA) at that time. The purpose of this letter is to formalize the HWP's comments.

The comments listed below need to be addressed before the CCR for SWMUs 8, 11, 25, and 26 is approved. You had indicated that the USEPA would provide a response to the HWP's comments, rather than the facility providing a response.

1. The first paragraph on page 4 states that the adult lead uptake-biokinetic model developed by USEPA (1996) was used to determine potential risks to on-site workers for lead, and to calculate a final protective clean-up level. Model calculations need to be provided for review.
2. The remedy chosen for SWMU 25 is an engineered barrier with institutional controls. Institutional controls language needs to be included in the CCR for SWMUs 8, 11, 25, and 26.

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Ms. Stephanie Doolan  
March 14, 2005  
Page Two

3. The last paragraph on page 7 requests that SWMUs 8, 11, 25, and 26 be excluded from permit requirements. A legal description of any property that is proposed to be removed from the jurisdiction of the current permit should be included in the CCR for SWMUs 8, 11, 25, and 26.
4. Contingency plan information regarding the asphalt cap over SWMUs 25 and 26 that is not addressed as part of institutional controls needs to be included in the CCR for SWMUs 8, 11, 25, and 26. Information such as:
  - a. Who will maintain the asphalt cap in the future?
  - b. Who will inspect it?
  - c. What will be the criteria that triggers the need for maintenance?
  - d. How will it be repaired and who will be contacted?
  - e. How will the sale of the property be handled to ensure that maintenance/inspection of the cap continues after the property is sold?

If you have any questions, please contact me at the Missouri Department of Natural Resources, HWP, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at (573) 751-3553.

Sincerely,

HAZARDOUS WASTE PROGRAM



Julie Pearson, P.E.  
Environmental Engineer  
Permits Section

JP:mj

c: Kansas City Regional Office